

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS**

WACKER DRIVE EXECUTIVE SUITES,  
LLC, on behalf of itself, individually, and  
on behalf of all others similarly situated,

Plaintiff,

v.

JONES LANG LASALLE AMERICAS  
(ILLINOIS), LP,

Defendant.

Case No. 1:18-cv-5492

Magistrate Judge Sunil R. Harjani

**DEFENDANT JONES LANG LASALLE AMERICAS (ILLINOIS), LP'S  
PARTIAL MOTION TO DISMISS PLAINTIFF'S  
FIRST AMENDED CLASS ACTION COMPLAINT**

Defendant Jones Lang LaSalle Americas (Illinois), LP (“JLL”), by its attorneys, and pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, moves to dismiss new claims brought by Plaintiff Wacker Drive Executive Suites, LLC (“Plaintiff” or “WDES”) in its Amended Complaint. Specifically, JLL moves to dismiss Plaintiff’s allegations that JLL violated Section 8(b)(4)(ii)(A) and (B) of the National Labor Relations Act (the “NLRA”), 29 U.S.C. § 158(b)(4)(ii)(A) and (B). In support of its Motion, JLL incorporates the Memorandum of Law filed herewith, and states as follows:

The Amended Complaint fails to state a claim upon which relief can be granted under Section 8(b)(4)(A) and (B) of the NLRA because this section can only be violated by *unions*, and JLL indisputably is not a union.

WHEREFORE, JLL respectfully requests that this Honorable Court grant JLL’s Partial Motion to Dismiss Plaintiff’s Amended Complaint and enter an Order dismissing Plaintiff’s claims with respect to Section 8(b)(4)(A) and (B) of the NLRA with prejudice.

Dated: September 20, 2019

Respectfully submitted,

JONES LANG LASALLE AMERICAS  
(ILLINOIS), LP

/s/ Scott T. Schutte

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**CERTIFICATE OF SERVICE**

I certify that on the 20th day of September 2019, a true and correct copy of the foregoing document was electronically filed with the Clerk of the Court using the Court's CM/ECF system, which will send notification to the following attorneys of record for Plaintiff:

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